

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA

VS.

ROBERT WILLIAM DAVIS
Defendant

3:07-mj-107

DECLARATION IN SUPPORT OF MOTION TO SEAL

AND NOW, the United States of America, by its undersigned counsel, submits the following Declaration in Support of the Government's Motion to Seal, pursuant to Rule 6 of the Federal Rules of Criminal Procedure.

1. Your declarant states that, in the view of your declarant this Declaration and the following documents should be filed under seal:

- | | |
|--|--|
| <input type="checkbox"/> Indictment | <input checked="" type="checkbox"/> Complaint |
| <input type="checkbox"/> Material Witness Warrant, and Affidavit | <input type="checkbox"/> Search Warrant, Application and Affidavit |
| <input type="checkbox"/> Plea Agreement | <input type="checkbox"/> Motion for Downward Departure |
| <input type="checkbox"/> Request for a Sentence Reduction | <input type="checkbox"/> Motion to Continue Change of Plea |

2. The United States requests that the above-referenced documents, and this Motion, remain under seal pending:

- ☒ Further Order of Court; or
- ☐ Written notification by the United States that these pleadings no longer need to remain filed under seal; or

☐ _____

3. In support of this Motion, the United States alleges that filing these pleadings under seal is necessary in order to:

- ☒ Preserve the integrity of this ongoing case;
- ☐ Ensure the safety of investigative personnel;
- ☐ Protect the identity of potential witnesses;
- ☒ Allow for the seizure of evidence;
- ☒ Permit the arrest of those charged with violations of criminal laws; or
- ☐ Allow this defendant to complete the cooperation aspects of the plea agreement.
- ☐ Avoid unfair prejudice to the defendants

WHEREFORE, for the foregoing reasons, the United States moves to seal this Declaration and the above-referenced pleadings. For the convenience of the Court, a proposed form of Order is attached.

Respectfully submitted,


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Dated: September 11, 2007